

EXHIBIT C

Marandola, Tyler R.

From: Williams, Matthew <mxw@msk.com>
Sent: Tuesday, December 10, 2019 10:32 AM
To: Wolfsohn, David J.; Marandola, Tyler R.; Oxholm, Kendra
Cc: Montclare, Paul; Lichtman, Leo; Nguyen, Elaine
Subject: ESI Search Terms
Attachments: Defendants' Proposed Search Terms(11739456.1).docx

I attach our proposed searches for the Phillies, and those with documents within the possession, custody and control of the Phillies, to run.

We reserve the right to request additional searches at a later date, and our proposal of these searches does not obviate the need for individuals to locate and identify responsive documents and files of which they are aware.

Please tell us who you propose as the appropriate custodians and/or departments for searching. Also, please let us know by Thursday what your position is with respect to running these searches, and when you can conduct the searches.

Regards,
Matt



J. Matthew Williams | Partner, through his professional corporation

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Defendants' Proposed Search Terms

- (Phanatic OR mascot) AND (Frank W/3 Sullivan)
- (Phanatic OR mascot) AND (Bill W/3 Giles)
- (Phanatic OR mascot) AND (David W/3 Montgomery)
- (Phanatic OR mascot) AND (Denny W/3 Lehman)
- (Phanatic OR mascot) AND (Larry W/3 Shenk)
- (Phanatic OR mascot) AND ((Kurt W/3 Funk) OR kfunk@phillies.com)
- (Phanatic OR mascot) AND ((Chris W/3 Legault) OR (Chris W/3 Long) OR clong@phillies.com)
- (Phanatic OR mascot) AND ((Debbie W/3 Nocito) OR dnocito@phillies.com)
- (Phanatic OR mascot) AND ((Andrew W/3 Guest) OR aguest@phillies.com)
- (Phanatic OR mascot) AND ((Scott W/3 Brandreth) OR sbrandreth@phillies.com)
- (Phanatic OR mascot) AND (Dave W/3 Buck)
- (Phanatic OR mascot) AND ((David W/3 Raymond) OR (Dave W/3 Raymond) OR david@raymondeg.com)
- (Phanatic OR mascot) AND ((Tom W/3 Burgoyne) OR tburgoyne@phillies.com)
- (Phanatic OR mascot) AND ((Matt W/3 Mehler) OR mmehler@phillies.com)
- (Phanatic OR mascot) AND ((Mike W/3 Alexander) OR philphan3@aol.com)
- (Phanatic OR mascot) AND ((Troy W/3 Sattin) OR tsattin@phillies.com)
- (Phanatic OR mascot) AND (Drew W/3 Mascienangelo)
- (Phanatic OR mascot) AND ((Chad W/3 Bowman) OR cbowman@phillies.com)
- (Phanatic OR mascot) AND ((Brian W/3 Sullivan) OR brian.delsul@gmail.com)
- (Phanatic OR mascot) AND ((Marisol W/3 Lezcano) OR mlezcano@phillies.com)
- (Phanatic OR mascot) AND ((Melissa W/3 Maani) OR mmaani@phillies.com)
- (Bonnie W/3 Erickson) OR bonzoroni@gmail.com OR yahsure@earthlink.net OR berickson@jimhensonlegacy.org OR bonnie@acmemascots.com OR yahsure@mac.com OR bonzobazaar@earthlink.net
- (Wayde W/3 Harrison) OR aweighted@icloud.com OR aweighed@me.com OR weighed@earthlink.net)
- “Harrison/Erickson” OR “H/E” OR Bonnie OR Wayde OR Acme OR (Harrison W/3 Erickson)
- @msk.co
- (Phanatic OR mascot) AND copyright*
- (Phanatic OR mascot) AND (“copyright office” OR registration* OR register*)
- (Phanatic OR mascot) AND (trademark* OR mark*)
- (Phanatic OR mascot) AND “intellectual property”
- (Phanatic OR mascot) AND (cease W/5 desist)
- (Phanatic OR mascot) AND demand
- (Phanatic OR mascot) AND merchandis*
- (Phanatic OR mascot) AND (green OR fury OR Galapagos)
- (Phanatic OR mascot) W/15 routine
- (Phanatic OR mascot) AND (creat* OR develop*)
- (Phanatic OR mascot) AND design*

- (Phanatic OR mascot) AND costume
- (Phanatic OR mascot) AND character
- (Phanatic OR mascot) W/15 own*
- (Phanatic OR mascot) W/15 mistake
- (Phanatic OR mascot) W/15 author*
- (Phanatic OR mascot) W/5 right*
- (Phanatic OR mascot) W/5 permission*
- (Phanatic OR mascot) AND (contract* OR agreement*)
- (Phanatic OR mascot) W/15 licens*
- (Phanatic OR mascot) AND (derivative OR “derivative work” OR “derivative works” OR adapt*)
- (Phanatic OR mascot) AND (valu* OR apprais*)
- (Phanatic OR mascot) AND promot*
- (Phanatic OR mascot) AND terminat*
- (Phanatic OR mascot) AND “good will”
- (Phanatic OR mascot) W/15 appear*
- (Phanatic OR mascot) AND (infring* OR litigation OR lawsuit OR suit OR case OR sue OR settle*)
- Schwartz OR Wolfsohn OR Abeles OR Clarke OR Osterberg
- (Phanatic OR mascot) AND (employ* W/15 contract)